

**DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION IN U.S. DISTRICT COURT**

BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT ☐ SUPERSEDING ☐ ORDER  
 Name of District Court, and/or Judge/Magistrate Location  
 NORTHERN DISTRICT OF CALIFORNIA

**OFFENSE CHARGED**

See attachment

- ☐ Petty  
☐ Minor  
☒ Misdemeanor  
☒ Felony

PENALTY:

**PROCEEDING**

Name of Complainant Agency, or Person (& Title, if any)

IRS, DEA

☐ person is awaiting trial in another Federal or State Court, give name of court

☐ this person/proceeding is transferred from another district per (circle one) FRCrP 20, 21 or 40. Show District

☐ this is a reprosecution of charges previously dismissed which were dismissed on motion of:

SHOW DOCKET NO.

☐ U.S. Att'y ☐ Defense

☐ this prosecution relates to a pending case involving this same defendant

☐ prior proceedings or appearance(s) before U.S. Magistrate regarding this defendant were recorded under

MAGISTRATE CASE NO.

Name and Office of Person  
 Furnishing Information on  
 THIS FORM

KEVIN V. RYAN

☒ U.S. Att'y ☐ Other U.S. Agency

Name of Asst. U.S. Att'y  
 (if assigned)

GEORGE L. BEVAN JR.

DEFENDANT - U.S.

CHUKA E. OGELE

DISTRICT COURT NUMBER  
 RICHARD W. WIEKING  
 CLERK, U.S. DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA  
 OAKLAND

CRO6-00546 MJJ

**FILED**

AUG - 3 2006

**DEFENDANT**

**IS NOT IN CUSTODY**

- 1) ☒ Has not been arrested, pending outcome this proceeding.  
 If not detained give date any prior summons was served on above charges
- 2) ☐ Is a Fugitive
- 3) ☐ Is on Bail or Release from (show District)

**IS IN CUSTODY**

- 4) ☐ On this charge
- 5) ☐ On another conviction
- 6) ☐ Awaiting trial on other charges } ☐ Fed'l ☐ State
- If answer to (6) is "Yes", show name of institution

Has detainer been filed?

☐ Yes  
☐ No

If "Yes" give date filed

DATE OF ARREST

Month/Day/Year

Or... if Arresting Agency & Warrant were not

DATE TRANSFERRED TO U.S. CUSTODY

Month/Day/Year

☐ This report amends AO 257 previously submitted

**ADDITIONAL INFORMATION OR COMMENTS**

**PROCESS:**

☐ SUMMONS ☐ NO PROCESS\*

☒ WARRANT

Bail Amount: NO BAIL

If Summons, complete following:

☐ Arraignment ☐ Initial Appearance

Defendant Address:

\*Where defendant previously apprehended on complaint, no new summons or warrant needed, since Magistrate has scheduled arraignment

Date/Time:

Before Judge:

Comments:

**PENALTY SHEET ATTACHMENT**

**Count 1** – Possession of Schedule III controlled substance with intent to distribute,

21 U.S.C. § 841(a)(1)

**Chuka Ogele**

5 years in prison, \$250,000 fine, at least 2 years supervised release, and \$100 special assessment.

**Count 2** – Possession of Schedule V controlled substance with intent to distribute,

21 U.S.C. § 841(a)(1)

**Chuka Ogele**

1 year in prison, \$100,000 fine, 1 year supervised release, and \$25 special assessment.

**Count 3** – Distribution of Schedule III controlled substances.

21 U.S.C. § 841(a)(1)

**Chuka Ogele**

5 years in prison, \$250,000 fine, at least 2 years supervised release, and \$100 special assessment.

**Count 4** – Conspiracy to possess with intent to distribute, and to distribute, Schedule III and V controlled substances, 21 U.S.C. § 846

**Chuka Ogele**

**Frederick Lamar Lindsey**

5 years in prison, \$250,000 fine, at least 2 years supervised release, and \$100 special assessment.

**Count 5** – Distribution of Schedule III and V controlled substances.  
21 U.S.C. § 841(a)(1)

**Chuka Ogele**

5 years in prison, \$250,000 fine, at least 2 years supervised release, and \$100 special assessment.

**Counts 6, 7, 8, 9** – Travel in Interstate commerce, or use of the mail, or other facility in interstate commerce, to promote unlawful activity, or distribute the proceeds of unlawful activity, 18 U.S.C. § 1952

**Chuka Ogele**

5 years in prison, \$250,000 fine, 3 years supervised release, and \$100 special assessment.

**Counts 8, 9** – Travel in Interstate commerce, or use of the mail, or other facility in interstate commerce, to promote unlawful activity, or distribute the proceeds of unlawful activity, 18 U.S.C. § 1952

**Frederick Lamar Lindsey**

5 years in prison, \$250,000 fine, 3 years supervised release, and \$100 special assessment.

**Counts 10-23** – Money laundering, 18 U.S.C. § 1956(a)(1)(A)(I)

**Chuka Ogele**

20 years in prison, \$500,000 fine, 5 years supervised release, and \$100 special assessment.

**Counts 24-29** – Structuring financial transactions to evade currency reporting requirements, 31 U.S.C. § 5324(a)(3)

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**Counts 30, 31, 32, 33, 34, 35, 36** – Engaging in monetary transaction in criminally derived property of a value greater than \$10,000, which in fact was derived from specified unlawful activity, 18 U.S.C. § 1957

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**Counts 34, 35, 36** – Engaging in monetary transaction in criminally derived property of a value greater than \$10,000, which in fact was derived from specified unlawful activity, 18 U.S.C. § 1957

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**Jeri Ogele**

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**Count 37** – conspiracy to violate 18 U.S.C. § 1957, 18 U.S.C. § 371

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**Jeri Ogele**

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**Count 38** – Engaging in monetary transaction in criminally derived property of a value greater than \$10,000, which in fact was derived from specified unlawful activity, 18 U.S.C. § 1957

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**Count 40** – Engaging in monetary transaction in criminally derived property of a value greater than \$10,000, which in fact was derived from specified unlawful activity, 18 U.S.C. § 1957

**Chuka Ogele**

**Jeri Ogele**

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# DEFENDANT INFORMATION RELATIVE TO A CRIMINAL ACTION IN U.S. DISTRICT COURT

BY: ☐ COMPLAINT ☐ INFORMATION ☒ INDICTMENT

Name of District Court, and/or Judge/Magistrate Location

☐ SUPERSEDED BY ORDER OF THE COURT  
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JERI OGELE

DISTRICT COURT NUMBER

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MJJ

FILED

AUG - 3 2006

RICHARD W. WIEKING  
CLERK, U.S. DISTRICT COURT  
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## **PENALTY SHEET ATTACHMENT**

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**Count 2** – Possession of Schedule V controlled substance with intent to distribute,

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**Count 4** – Conspiracy to possess with intent to distribute, and to distribute, Schedule III and V controlled substances, 21 U.S.C. § 846

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SHOW  
DOCKET NO.

MAGISTRATE  
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DEFENDANT - U.S.

FREDERICK LAMAR LINDSEY

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10 years in prison, \$250,000 fine, 3 years supervised release, and \$100 special assessment.

**Count 39** – Engaging in monetary transaction in criminally derived property of a value greater than \$10,000, which in fact was derived from specified unlawful activity, 18 U.S.C. § 1957

**Jeri Ogele**

10 years in prison, \$250,000 fine, 3 years supervised release, and \$100 special assessment.

**Count 40** – Engaging in monetary transaction in criminally derived property of a value greater than \$10,000, which in fact was derived from specified unlawful activity, 18 U.S.C. § 1957

**Chuka Ogele**

**Jeri Ogele**

10 years in prison, \$250,000 fine, 3 years supervised release, and \$100 special assessment.

# United States District Court

~~RECEIVED ORDER  
OF THE COURT~~

FOR THE  
NORTHERN DISTRICT OF CALIFORNIA  
CRIMINAL DIVISION  
VENUE: OAKLAND

UNITED STATES OF AMERICA,  
v.

CHUKA E. OGELE  
JERI OGELE  
FREDERICK LAMAR LINDSEY

CR06-00546 MJJ

FILED  
2006 AUG -3 PM 2:12  
RICHARD W. WENKING  
CLERK, U.S. DIST. CT. OF CALIFORNIA  
NORTHERN DISTRICT

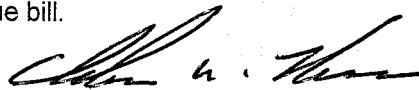
DEFENDANT.

## INDICTMENT

[SEE NEXT PAGE]

①

A true bill.



Foreman

Filed in open court this \_\_\_\_\_ day of \_\_\_\_\_.

Clerk

Bail, \$

*No bail arrest warrants for  
Vazir De Brazil  
8-3-06  
all defendants.*

KEVIN V. RYAN (CSBN 118321)  
United States Attorney

Attorney for Plaintiff

FILED  
2006 AUG -3 PM 2:12  
RICHARD W. WICKING  
CLERK, U.S. DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
OAKLAND DIVISION

**CRO6-00546**

UNITED STATES OF AMERICA,

Plaintiff,

v.

CHUKA E. OGELE,  
JERI OGELE, and  
FREDERICK LAMAR LINDSEY,

Defendants.

No.

VIOLETIONS: 21 U.S.C. § 841(a)(1) --  
Possession of Controlled Substances With  
Intent to Distribute; 21 U.S.C. § 841(a)(1) --  
Distribution of Controlled Substances;  
21 U.S.C. § 846 -- Conspiracy to Distribute  
Controlled Substances; 18 U.S.C. § 1952 --  
Travel in Interstate Commerce to Promote  
Unlawful Activity; and Use of Facility in  
Interstate Commerce to Distribute Proceeds of  
Unlawful Activity; 18 U.S.C. § 1956(a)(1)(A) -- Money Laundering to  
Promote Specified Unlawful Activity;  
18 U.S.C. § 1957 -- Engaging in Monetary  
Transactions Derived from Specified  
Unlawful Activity; 18 U.S.C. § 371 --  
Conspiracy to Engage in Monetary  
Transactions Derived from Specified  
Unlawful Activity; 31 U.S.C. § 5324(a)(3) --  
Structuring Cash Transactions to Evade  
Currency Reporting Requirements.

OAKLAND VENUE

INDICTMENT

The Grand Jury charges:

INDICTMENT

1 COUNT ONE: 21 U.S.C. § 841(a)(1) ✓

2 Between in or about July 2002 and September 2004, in the Northern District of  
3 California, and elsewhere, defendant

4 CHUKA E. OGELE

5 did knowingly and intentionally possess with intent to distribute, Schedule III controlled  
6 substances, namely, hydrocodone and acetamin with codeine, in violation of Title 21,  
7 United States Code, Section 841(a)(1).

8  
9 COUNT TWO: 21 U.S.C. § 841(a)(1) ✓

10 Between in or about August 2003 and September 2004, in the Northern District of  
11 California, and elsewhere, defendant

12 CHUKA E. OGELE

13 did knowingly and intentionally possess with intent to distribute, a Schedule V controlled  
14 substance, namely, promethazine with codeine, in violation of Title 21, United States  
15 Code, Section 841(a)(1).

16  
17 COUNT THREE: 21 U.S.C. § 841(a)(1) ✓

18 Between in or about July 2002 and March 2004, in the Northern District of  
19 California, defendant

20 CHUKA E. OGELE

21 did knowingly and intentionally distribute Schedule III controlled substances, namely,  
22 hydrocodone and acetamin with codeine, in violation of Title 21, United States Code,  
23 Section 841(a)(1).

24 //

25 //

26 //

27 //

28 //

1 COUNT FOUR: 21 U.S.C. § 846

2 Between in or about April 2004 and September 2004, in the Northern District of  
3 California and the Southern District of Texas, defendants

4 CHUKA E. OGELE,  
5 FREDERICK LAMAR LINDSEY,

6 and others, did knowingly and intentionally conspire to possess with intent to distribute,  
7 and to distribute, Schedule III and V controlled substances, in violation of Title 21,  
8 United States Code, Section 846.

9 COUNT FIVE: 21 U.S.C. § 841(a)(1)

10 Between in or about April 2004 and September 2004, in the Northern District of  
11 California and the Southern District of Texas, defendant

12 CHUKA E. OGELE

13 did knowingly and intentionally distribute Schedule III and V controlled substances  
14 containing codeine, in violation of Title 21, United States Code, Section 841(a)(1).  
15

16 COUNT SIX: 18 U.S.C. §§ 1952 and 2

17 Between in or about April 2004 and September 2004, in the Northern District of  
18 California and the Southern District of Texas, and elsewhere, defendant

19 CHUKA E. OGELE

20 aided and abetted other persons to travel in interstate commerce with the intent to  
21 promote, manage, establish, carry on, and facilitate the promotion, management,  
22 establishment, and carrying on, of unlawful activity within the meaning of 18 U.S.C.  
23 § 1952(b), namely, the unlawful distribution of controlled substances by a business  
24 enterprise; and thereafter, such other persons performed one or more acts described in 18  
25 U.S.C. § 1952(a)(3), all in violation of Title 18, United States Code, Sections 1952 and 2.  
26

27 //

28 //

1 COUNT SEVEN: 18 U.S.C. § 1952

2 On or about and between August 31, 2004 and September 2, 2004, in the Northern  
3 District of California and the Southern District of Texas, defendant

4 CHUKA E. OGELE

5 traveled in interstate commerce with the intent to promote, manage, establish, carry on,  
6 and facilitate the promotion, management, establishment, and carrying on, of unlawful  
7 activity within the meaning of 18 U.S.C. § 1952(b), namely, unlawful the distribution of  
8 controlled substances by a business enterprise; and thereafter, the defendant performed  
9 one or more acts described in 18 U.S.C. § 1952(a)(3), all in violation of Title 18, United  
10 States Code, Sections 1952.

11  
12 COUNT EIGHT: 18 U.S.C. §§ 1952 and 2

13 Between in or about April 2004 and September 2004, in the Northern District of  
14 California and the Southern District of Texas, and elsewhere, defendant

15 FREDERICK LAMAR LINDSEY

16 aided and abetted other persons to travel in interstate commerce, with the intent to  
17 distribute the proceeds of unlawful activity, and to promote, manage, establish, carry on,  
18 and facilitate the promotion, management, establishment, and carrying on, of unlawful  
19 activity within the meaning of 18 U.S.C. § 1952(b), namely, the unlawful distribution of  
20 controlled substances by a business enterprise; and thereafter, such other persons  
21 performed one or more acts described in 18 U.S.C. § 1952(a)(1) or (3), all in violation of  
22 Title 18, United States Code, Sections 1952 and 2.

23 //

24 //

25 //

26 //

27 //

28 //



COUNT NINE: 18 U.S.C. § 1952

Between in or about May 2004 and September 2004, in the Southern District of Texas, defendant

FREDERICK LAMAR LINDSEY

used the mail and a facility in interstate commerce with the intent to distribute the proceeds of unlawful activity, and to promote, manage, establish, carry on, and facilitate the promotion, management, establishment, and carrying on, of unlawful activity within the meaning of 18 U.S.C. § 1952(b), namely, the unlawful distribution of controlled substances by a business enterprise; and thereafter, the defendant performed one or more acts described in 18 U.S.C. § 1952(a)(1) and (3), all in violation of Title 18, United States Code, Sections 1952.

COUNTS TEN THROUGH TWENTY-THREE: 18 U.S.C. § 1956(a)(1)(A)(i) *money laundering: cwp*

On or about the dates set forth herein for each count, in the Northern District of California, defendant

CHUKA E. OGELE,

knowing that the property involved in each listed financial transaction represented the proceeds of some form of unlawful activity, namely, the unlawful distribution of controlled substances, conducted financial transactions which in fact involved the proceeds of such specified unlawful activity, with the intent to promote the carrying on of such specified unlawful activity:

	<u>Date of Transaction</u>	<u>Amount</u>	<u>Payee</u>
Count 10	12-30-03	\$14,475.76	R&S Sales
Count 11	1-30-04	\$20,000	R&S Sales
Count 12	3-1-04	\$15,000	R&S Sales
Count 13	3-17-04	\$20,000	Priority Healthcare
Count 14	5-15-04	\$10,000	Priority Healthcare
Count 15	5-15-04	\$15,000	R&S Sales

Count 16	5-30-04	\$10,000	Priority Healthcare
Count 17	6-15-04	\$10,000	R&S Sales
Count 18	6-30-04	\$20,000	Priority Healthcare
Count 19	7-6-04	\$29,877.20	Priority Healthcare
Count 20	7-19-04	\$64,004.20	Priority Healthcare
Count 21	7-26-04	\$64,004.20	Priority Healthcare
Count 22	8-2-04	\$177,883.95	Priority Healthcare
Count 23	9-22-04	\$200,000	Priority Healthcare

All in violation of Title 18, United States Code, Section 1956(a)(1)(A)(~~Y~~). i cwp #

COUNTS TWENTY-FOUR THROUGH TWENTY-NINE: 31 U.S.C. § 5324(a)(3)

On or about the dates set forth herein for each count, in the Northern District of California, defendant

CHUKA E. OGELE

did knowingly structure the following financial transactions with Wells Fargo Bank, a domestic financial institution, for the purpose of evading the reporting requirements of 31 U.S.C. § 5313(a) and the regulations promulgated thereunder:

	<u>Date of Deposits</u>	<u>No. of Cash Deposits</u>	<u>Total Cash Deposited</u>
Count 24	6-22-04	19	\$19,000
Count 25	6-25-04	27	\$27,000
Count 26	6-28-04	20	\$20,000
Count 27	7-2-04	30	\$30,000
Count 28	7-12-04	40	\$40,000
Count 29	7-14-04	15	\$15,000

All in violation of Title 31, United States Code, Section 5324(a)(3).

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1 COUNT THIRTY: 18 U.S.C. § 1957

2 On or about July 26, 2004, in the Northern District of California, defendant

3 CHUKA E. OGELE

4 did knowingly engage in a monetary transaction in criminally derived property of a value  
5 greater than \$10,000, and which in fact was derived from specified unlawful activity,  
6 namely, the defendant deposited the sum of \$176,899 in currency into an account at Wells  
7 Fargo Bank, which funds in fact were derived from the unlawful distribution of controlled  
8 substances, in violation of Title 18, United States Code, Section 1957.

9  
10 COUNT THIRTY-ONE: 18 U.S.C. § 1957

11 On or about March 12, 2004, in the Northern District of California, defendant

12 CHUKA E. OGELE

13 did knowingly engage in a monetary transaction in criminally derived property of a value  
14 greater than \$10,000, and which in fact was derived from specified unlawful activity,  
15 namely, the defendant paid the sum of \$17,000 in currency to the European Auto Center  
16 in El Cerrito, California, for the purchase of a 1999 Mercedes Benz automobile, which  
17 funds in fact were derived from the unlawful distribution of controlled substances, in  
18 violation of Title 18, United States Code, Section 1957.

19  
20 COUNT THIRTY-TWO: 18 U.S.C. § 1957

21 On or about June 18, 2004, in the Northern District of California, defendant

22 CHUKA E. OGELE

23 did knowingly engage in a monetary transaction in criminally derived property of a value  
24 greater than \$10,000, and which in fact was derived from specified unlawful activity,  
25 namely, the defendant paid the sum of \$63,900 in currency to Weatherford BMW auto  
26 dealership in Berkeley, California, for the purchase of a 2004 BMW automobile, which  
27 funds in fact were derived from the unlawful distribution of controlled substances, in  
28 violation of Title 18, United States Code, Section 1957.

1 COUNT THIRTY-THREE: 18 U.S.C. § 1957

2 On or about January 7, 2005, in the Northern District of California, defendant

3 CHUKA E. OGELE

4 did knowingly engage in a monetary transaction in criminally derived property of a value  
5 greater than \$10,000, and which in fact was derived from specified unlawful activity,  
6 namely, the defendant paid the sum of \$31,033 in currency to Clear Lake Infinity car  
7 dealership in Houston, Texas, for the purchase of a 2001 Toyota Landcruiser SUV, which  
8 funds in fact were derived from the unlawful distribution of controlled substances, in  
9 violation of Title 18, United States Code, Section 1957.

10  
11 COUNT THIRTY-FOUR: 18 U.S.C. §§ 1957 and 2

12 On or about July 23, 2004, in the Northern District of California, defendants

13 CHUKA E. OGELE, and  
14 JERI OGELE

15 did knowingly engage in a monetary transaction, and did aid and abet in engaging in a  
16 monetary transaction, in criminally derived property of a value greater than \$10,000, and  
17 which in fact was derived from specified unlawful activity, namely, the defendants  
18 deposited and aided and abetted in the deposit of the sum of \$224,835 in currency into an  
19 account at Wells Fargo Bank, which funds in fact were derived from the unlawful  
20 distribution of controlled substances, in violation of Title 18, United States Code,  
21 Sections 1957 and 2.

22 COUNT THIRTY-FIVE: 18 U.S.C. §§ 1957 and 2

23 On or about July 23, 2004, in the Northern District of California, defendants

24 CHUKA E. OGELE, and  
25 JERI OGELE

26 did knowingly engage in a monetary transaction, and did aid and abet in engaging in a  
27 monetary transaction, in criminally derived property of a value greater than \$10,000, and  
28 which in fact was derived from specified unlawful activity, namely, the defendants

1 deposited and aided and abetted in the deposit of the sum of \$139,310 in currency into an  
2 account at Wells Fargo Bank, which funds in fact were derived from the unlawful  
3 distribution of controlled substances, in violation of Title 18, United States Code,  
4 Sections 1957 and 2.

5  
6 COUNT THIRTY-SIX: 18 U.S.C. §§ 1957 and 2

7 On or about September 20, 2004, in the Northern District of California, defendants  
8 CHUKA E. OGELE, and  
9 JERI OGELE  
10 did knowingly engage in a monetary transaction, and did aid and abet in engaging in a  
11 monetary transaction, in criminally derived property of a value greater than \$10,000, and  
12 which in fact was derived from specified unlawful activity, namely, the defendants  
13 deposited and aided and abetted in the deposit of the sum of \$102,771 in currency into an  
14 account at Wells Fargo Bank, which funds in fact were derived from the unlawful  
15 distribution of controlled substances, in violation of Title 18, United States Code,  
16 Sections 1957 and 2.

17 COUNT THIRTY-SEVEN: 18 U.S.C. § 371

18 Between on or about July 29, 2004 and September 2, 2004, in the Northern District  
19 of California and elsewhere, defendants

20 CHUKA E. OGELE, and  
21 JERI OGELE

22 did knowingly conspire to engage and attempt to engage in a monetary transaction in  
23 criminally derived property of a value greater than \$10,000 and which in fact was derived  
24 from specified unlawful activity, namely, the defendants attempted to purchase a  
25 residence in El Cerrito, California, for the purchase price of \$1,300,000, to be paid for  
26 with the proceeds from the unlawful sale of controlled substances, in violation of 18  
27 U.S.C. § 1957.

28 //

1 In furtherance of the conspiracy and to attain the objectives thereof, the defendants  
2 committed the following overt acts, among others, in the Northern District of California  
3 and the Southern District of Texas:

4 (a) On July 29, 2004, defendant Jeri Ogele signed on behalf of herself and  
5 defendant Chuka Ogele a purchase agreement for the purchase of a residence at 1024  
6 Arlington Boulevard, El Cerrito, California, for the purchase price of \$1,300,000. The  
7 purchase agreement specified that the purchase would be "all cash," meaning that the  
8 defendants would not be financing any portion of the purchase money.

9 (b) On or about July 29, 2004, defendant Chuka Ogele wrote a check in the  
10 amount of \$15,000, payable to Commonwealth Title, for the opening deposit into escrow  
11 for the purchase of the residence.

12 (c) On or about July 30, 2004, defendant Jeri Ogele signed a letter addressed to  
13 the sellers of the residence, in which she falsely represented that defendant Chuka Ogele  
14 was a medical doctor.

15 (d) On or about August 11, 2004, defendant Jeri Ogele wrote a check in the  
16 amount of \$22,500, payable to Commonwealth Title, for an additional deposit into escrow  
17 for the purchase of the residence.

18 (e) On or about August 30, 2004, defendant Chuka Ogele wrote a check in the  
19 amount of \$10,000, payable to Commonwealth Title, for an additional deposit into escrow  
20 for the purchase of the residence.

21 (f) On or about August 31, 2004, defendants Chuka Ogele and Jeri Ogele  
22 traveled from Oakland, California, arriving in Houston, Texas, on September 1, 2004.

23 (g) On or about September 2, 2004, defendant Chuka Ogele obtained the sum  
24 of \$975,381 in currency, derived from the sale of controlled substances.

25 (h) On or about September 2, 2004, defendants Chuka Ogele and Jeri Ogele  
26 packed the currency into their luggage, intending to transport this currency on their return

27 //

28 //



1 flight back to Oakland, and to thereafter use this currency toward the purchase of the  
2 residence.

3 All in violation of Title 18, United States Code, Section 371.

4  
5 COUNT THIRTY-EIGHT: 18 U.S.C. § 1957

6 On or about July 29, 2004, in the Northern District of California, defendant

7 CHUKA E. OGELE

8 did knowingly engage in a monetary transaction in criminally derived property of a value  
9 greater than \$10,000, and which in fact was derived from specified unlawful activity,  
10 namely, the defendant wrote a check in the amount of \$15,000, payable to  
11 Commonwealth Title, for the opening deposit into escrow for the purchase of a residence  
12 in El Cerrito, California, which funds in fact were derived from the unlawful distribution  
13 of controlled substances, in violation of Title 18, United States Code, Section 1957.

14  
15 COUNT THIRTY-NINE: 18 U.S.C. § 1957

16 On or about August 11, 2004, in the Northern District of California, defendant

17 JERI OGELE

18 did knowingly engage in a monetary transaction in criminally derived property of a value  
19 greater than \$10,000, and which in fact was derived from specified unlawful activity,  
20 namely, the defendant wrote a check in the amount of \$22,500, payable to  
21 Commonwealth Title, for an additional deposit into escrow for the purchase of a  
22 residence in El Cerrito, California, which funds in fact were derived from the unlawful  
23 distribution of controlled substances, in violation of Title 18, United States Code, Section  
24 1957.

25 //

26 //

27 //

28 //

COUNT FORTY: 18 U.S.C. § 1957

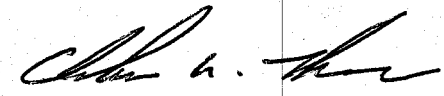
On or about September 2, 2004, in the Northern District of California and elsewhere, defendants

CHUKA E. OGELE, and  
JERI OGELE ✓

did knowingly attempt to engage in a monetary transaction in criminally derived property of a value greater than \$10,000, and which in fact was derived from specified unlawful activity, namely, the defendants obtained the sum of \$975,381 in currency in Houston, Texas, intending to transport this currency back to the Northern District of California, to be used toward the purchase of a residence in El Cerrito, California, which funds in fact were derived from the distribution of controlled substances, in violation of Title 18, United States Code, Section 1957.

A TRUE BILL.

Dated: AUGUST 3, 2006

  
FOREPERSON

KEVIN V. RYAN  
United States Attorney

  
W. DOUGLAS SPRAGUE  
Chief, Oakland Branch Office

(Approved as to form:   
AUSA GLBEVANJR